

FILED

2015 MAY 29 P 4:41
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA

SATYAJIT SANYAL, Pro Se)

Plaintiff)

)

Vs.) Case # 1:14-cv-00960-JCC-TCB

)

Toyota Motor North America, Inc., et al)

Defendants)

PLAINTIFFS WITNESS. DOCUMENTS AND EXHIBITS LISTS FOR
TRIAL

Plaintiff, SATYAJIT SANYAL, by Pro Se, hereby provide the following Lists of
Witnesses, Documents and Exhibits expect to offer at the Trial proceedings:

Witnesses Plaintiff Expect to Present at Trial

Witness Present Live at Trial:

Satyajit Sanyal

Mailing Address:

11654 Plaza America Drive, # 622

Reston, Virginia – 20190

551-208-4891 (Cell)

Witnesses Plaintiff Expects and Proposes to be Present Live at Trial:

1) Police Office Jay H. Choi, Badge Number 5093

Herndon Police Department

397 Herndon Parkway

Herndon, Virginia 20170

703-435-6846

2) Sgt. S. Pihonak

Herndon Police Department

397 Herndon Parkway

Herndon, Virginia 20170

703-435-6846

3) Mr. Daniel Delboy

Fairfax County Fire and Rescue

4100 Chain Bridge Road

Fairfax, Virginia – 22030

703-246-2126

4) Mr. Adam Heming

**Fairfax County Fire and Rescue
4100 Chain Bridge Road
Fairfax, Virginia – 22030
703-246-2126**

5) Mr. Vernon Johnson

**Fairfax County Fire and Rescue
4100 Chain Bridge Road
Fairfax, Virginia – 22030
703-246-2126**

6) Mr. Ronald Seghetti

**Fairfax County Fire and Rescue
4100 Chain Bridge Road
Fairfax, Virginia – 22030
703-246-2126**

7) Dr. Peter Paganussi, M.D.

**Reston Hospital Center
1850 Town Center Parkway
Reston, Virginia – 20190
703-689-9000**

8) Dr. Shabih U. Hasan, M.D.

Dulles Neurology Clinic
722 Grant Street, Suite F
Herndon, Virginia – 20170
703-787-7638

9) Dr. Tajammul Eshan, M.D.

Reston Hospital Center
1850 Town Center Parkway
Reston, Virginia – 20190
703-689-9000

10) Mrunalini Chakurkar, M.D.

Reston Hospital Center
1850 Town Center Parkway
Reston, Virginia – 20190
703-689-9000

11) Officers and Representatives from NHTSA

12) Officers and Representatives from DOT

Trial Witness (Expected by Written Deposition):

9-1-1 Caller

Documents and Exhibits Plaintiff Expects to Offer at Trial:

- 1) Herndon Police Report
- 2) Subject Vehicle Photographs
- 3) Subject Accident Scene Photographs
- 4) Subject Vehicle Testing Photographs
- 5) 9-1-1 EMS Call Reports
- 6) Records from Fairfax County Fire and Rescue
- 7) Photographs and Video from Filename 464888U
- 8) Photographs and Video from Filename 464888W
- 9) Doctors Note by Dr. Shabih U. Hasan, M.D. confirming Post Traumatic Seizure after MVA
- 10) Doctors Note by Dr. Tajammul Eshan, M.D. confirming Post Traumatic Epilepsy
- 11) Geico Insurance Repair Estimate for Subject Vehicle
- 12) Plaintiff's Medical Bills and Insurance Claim Records
- 13) Financial Disclosure Statements by Toyota
- 14) Crash Data Retrieval EDR Report of 04/03/2015 for Subject Vehicle VIN# 4T1BF3EK9BU658720
- 15) Copy of Deposition of Plaintiff Satyajit Sanyal taken by Defendants Attorney on 03/27/2015
- 16) Plaintiff's Memorandum, Statements and Responses Including Opposition to Defendant's Joint Stipulation of Uncontested Facts
- 17) Copies of documents from Case # 1:14-CV-00906-JCC-JFA (Satyajit Sanyal Vs Toyota Motor Corporation)
- 18) Amended Complaint with Exhibits

- 19) Plaintiff's Responses to Defendant Toyota Motor Sales, U.S.A., INC'S. Interrogatories
- 20) Plaintiff's Responses to Defendant Toyota Motor Manufacturing Kentucky, INC's. Interrogatories
- 21) 2011 Toyota Camry Sales Brochure
- 22) 2011 Toyota Camry Owner's Manual pages
- 23) Plaintiff's Discharge Report from Reston Hospital Center after Subject Accident
- 24) Defendants Expert Witness Disclosure
- 25) Printouts of E-mails communications on Unintended Acceleration
- 26) Plaintiff's Responses to Defendant Toyota Motor Sales, U.S.A., INC'S. Requests for Production of Documents with Enclosures and Exhibits
- 27) Plaintiff's Responses to Defendant Toyota Motor Manufacturing Kentucky, INC's. Requests for Production of Documents with Enclosures

and Exhibits
28) PLAINTIFF'S MEDICAL RECORDS
29) PLAINTIFF'S W2 AND INCOME RECORDS (30) 2011 TOYOTA CAMRY COMPLAINTS WITH
NHSTA
UNINTENDED ACCELERATION AND
OTHER TOYOTA CASES RELATED TO WA
UNINTENDED ACCELERATION ISSUES
Respectfully Submitted, this 29th day of May 2015. (31)

By:  05/29/2015
SATYAJIT SANYAL, Pro Se

Satyajit Sanyal

Mailing Address:

11654 Plaza America Drive, #622,

Reston, Virginia - 20190

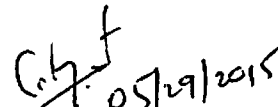
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SATYAJIT SANYAL, Pro Se)	
)	
Plaintiff)	
)	
Vs.)	Case # 1:14-cv-00960-JCC-TCB
)	
Toyota Motor North America, Inc., et al)	
)	
Defendants)	

VERIFICATION

I, SATYAJIT SANYAL, by Pro Se, hereby declare under penalty of perjury that the facts stated in the foregoing Plaintiff's Witness, Documents and Exhibits Lists for Trial are true and correct to the best of my knowledge and belief.

Respectfully Submitted, this 29th day of May 2015.

By: 
SATYAJIT SANYAL, Pro Se

Satyajit Sanyal

Mailing Address:

11654 Plaza America Drive, #622,

Reston, Virginia - 20190

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA**

SATYAJIT SANYAL, Pro Se)	
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Plaintiff)	
)	
Vs.)	Case # 1:14-cv-00960-JCC-TCB
)	
Toyota Motor North America, Inc., et al)	
)	
Defendants)	

CERTIFICATE OF SERVICE

Plaintiff's Witness, Documents and Exhibits Lists for Trial will be mailed or delivered to Defendant's Attorney on record:

Joel A. Dewey

Paul J. Day

DLA Piper LLP (US)

The Marbury Building

6225 Smith Avenue

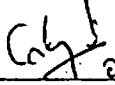
Baltimore, Maryland – 21209

CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of this document.

SATYAJIT SANYAL
Name of *Pro Se* Party (Print or Type)

 05/29/2015
Signature of *Pro Se* Party

Executed on: 05/29/2015 (Date)

OR

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)
Prepared, or assisted in the preparation of, this document.

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)